

Defendant worked in Fairfax County, Virginia, but did not have personal contact information for him.

6. As a courtesy, we decided to call Mr. Sidar and inform him that we had filed a Complaint against him, our purpose being to inform him of the suit, determine whether he had counsel, discuss the matter with him and arrange for service, if necessary.

7. Mr. Urban and I tried to call Mr. Sidar on September 16, 2019, using a number that we located. We tried calling a landline number but there was no answer. We made this first call on September 16, 2019 at 15:13. See, Exhibit A, Text, September 16, 2019 at 15:13.

8. Having not reached Mr. Sidar, I texted Mr. Urban on September 17, 2019, to tell him that Plaintiff had no contact information for him. This text was on September 17, 2019, at 17:33. Exhibit A, Text, September 17, 2019, at 17:33.

9. Mr. Urban replied that he would try calling Jonathan Phillips, former counsel for Mr. Sidar, to see if he had a number. Exhibit A, Text, September 17, 2019, at 17:35.

10. I sent Mr. Urban a contact card for Mr. Sidar on September 17th, at 18:12. Exhibit A, Text, September 17th, at 18:12. Until this time, we still did not have correct contact information for Mr. Sidar and could not (and did not) contact him.

11. Mr. Urban and I jointly reached Mr. Sidar at 6:36 p.m. on September 17, 2019, and we spoke with him until 6:51 p.m. I have my hand-written contemporaneous notes and my Affidavit is based upon those notes and my recollection. I attach a copy of my notes to this Affidavit and will bring the original to the upcoming hearing. Exhibit B.

12. My notes reflect that we informed Mr. Sidar that we had filed suit and explained the basis of the suit. His response was that “this is not fair.”

13. We first asked him not to contact our client and warned him that we would have to obtain a stalking or similar order if he attempted to contact her. We also told him that we would be requesting a DNA sample.

14. Mr. Sidar replied, "I was on top of her, don't really know what happened, don't think I penetrated her." He said, "we were close and made out all night." He said that they were both drunk and making out all night.

15. We told Mr. Sidar that there was DNA on Jane Doe's pajamas and Mr. Sidar replied that he thought Jane Doe slept naked. He told us that he was divorced and going through difficult financial times.

16. Mr. Sidar then suggested that we meet in person to discuss the case. He suggested that we meet at his offices in DC on September 25th at 3 p.m. He asked us what else was in our Complaint. We told him that we were asking for damages and attorneys' fees and reiterated we would be requesting a DNA sample. Mr. Sidar gave us his email address, Redact and asked if we could send him a copy of the Complaint for his review. He told us that he lives in D.C. and admitted that he had a company with a physical address in Fairfax County, registered with the Va. State Corporation Commission. He also offered the address Redact Redact

17. We then terminated the call exactly fifteen (15) minutes later. This was the only call we had with Mr. Sidar. I categorically deny that the quoted statement by Mr. Sidar in his Affidavit was made at any time during this sole call, or at any other time.

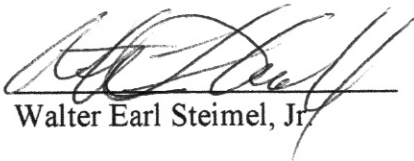
18. The following day, on September 18 at 2:15 p.m., Mr. Urban sent me a text stating that he received a voicemail from Alex Mitrakas who represented himself as representing Mr. Sidar. Exhibit A, Text, September 18 at 2:15 p.m. Since then, Mr. Sidar has been always

represented in this matter by various counsel. As a result, Plaintiff's Counsel has never had another conversation with Mr. Sidar without his counsel present.

19. Besides the initial fifteen (15) minute courtesy call we had with Defendant the day prior to his retaining counsel, we have had no other contacts with Defendant outside of the presence of counsel and never threatened Defendant in any manner.

20. To the best of my recollection, the only other personal interactions we have had with Defendant were either in hearings in the Fairfax County case, in the hallway outside of a hearing room and during two personal jurisdiction depositions at Mr. Urban's office; in all Mr. Mitrakas was present.

21. I certify under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and ability.


Walter Earl Steimel, Jr.

July 25, 2022
Date

**Attachment to Affidavit
Curriculum Vitae**

Walter Steimel, Jr.

PRINCIPAL AREAS OF PRACTICE

State and federal court litigation; administrative agency practice
Communications and internet/cyberlaw; cybersecurity
Corporate and business consulting
Data/information privacy and value
Federal agency practice (FCC, FTC, BIS, OFAC, FBAR, CBP)
International business transactions, trade and compliance
Trademark, copyright and unfair competition
Trade secret and trade dress

PROFESSIONAL EMPLOYMENT EXPERIENCE

- . Founding Member, Manager, Steimel Counselors Law Group, 2017-Present
 - . State and Federal Court litigation; Administrative litigation
 - . Technology, Internet (SIP/VoIP), communications, cybersecurity, data ownership and privacy
 - . International business trade and sanctions, intellectual property
- . Principal, Steimel Law Group, 2015-17
 - . State and Federal Court litigation; Administrative litigation
 - . International business, trade and sanctions, Internet, communications, privacy and data security, intellectual property, international business
 - . International business trade and sanctions, intellectual property
- . Partner, Loeb & Loeb, Washington, D.C., 2010-2015
 - . Communications contract negotiation, regulation and related litigation
 - . International business, trademark, administrative and court litigation
- . Shareholder, Greenberg Traurig, Washington, D.C., 2000-10
 - . Practice group leader in telecommunications
 - . Telecommunications, intellectual property, international business and litigation
 - . State and Federal Court litigation; Administrative litigation
- . Partner, Hunton & Williams, Washington, D.C., 1996-99
 - . Head of Communications Practice Group, telecommunications, intellectual property, export controls and litigation
- . Partner/Principal, Fish & Richardson, Washington, D.C., 1991-96
 - . Head of Trademark and Telecommunications Practice Groups in D.C. Office
- . Associate, Bell, Boyd & Lloyd, Washington, D.C., 1989-91
- . Attorney, Federal Communications Commission, Common Carrier Bureau, Washington, D.C., 1988-89
- . Counsel to the Commissioner and Chair, Public Utility Commission of Texas, Austin, Texas, 1983-87

Walter Steimel, Jr.

- Communications, Electric and Water Utility regulatory work
- Legislative Counsel & Senior Aide to State Senator, Austin, Texas, 1982-83
 - Drafted enacted versions of the Texas Public Utility Regulatory Act and legislation expanding admissibility of evidence in prosecution of sex crimes
 - Seconded Special Prosecutor for sex crimes
- Associate, Bracewell & Patterson, Houston, Texas, 1981-82

SELECTED PROFESSIONAL INVOLVEMENT

- Catholic University of America, Graduate School of Engineering:
 - Adjunct Professor, Privacy and Information Security, CSC EE 526 (2017-present)
 - Adjunct Professor, Cybersecurity and Network Security, CSC EE 565 (2017-19)
- Texas Christian University, Neeley School of Business:
 - Visiting Scholar/Adjunct, Texas Christian University, Entrepreneurship in Emerging Economies, MANA 30703, Intercession (2014-19)
 - Judge, TCU Values and Ventures Business Plan Competition (2013, 2017)

EDUCATION

- LL.M. program, (partial completion), Georgetown University Law Center, 1997-98
 - International and comparative law, international communications
- J.D., University of Texas School of Law, 1981
 - Notes and Comments Editor, *Texas International Law Journal*
 - Honors: Phi Delta Phi
- B.B.A., *cum laude*, Accounting, Texas Christian University, 1978
 - University Honors; Honors in Accounting, Economics and Business

PROFESSIONAL LICENSES AND ADMISSIONS TO PRACTICE

- Supreme Court of Texas, Bar Number 19127500
- District of Columbia, Bar Number 446262
- Certified Public Accountant, Texas, Certificate Number 34497
- National Football Players Association, Contract Advisor (2003-04)
- Supreme Court; US Courts of Appeals for the 1st, 2nd, 3rd, 4th, 5th, 6th, 8th, 9th, 10th, 11th, D.C., and Federal Circuits; US District Courts of D.C., Maryland, New Mexico, N.D. Texas and S.D. Texas

CONTACT INFORMATION

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EXHIBIT A

Text Messages

September 16, 2019 at 15:13

September 17, 2021, at 17:33

September 17, 2019, at 17:35

September 17th, at 18:12

September 18 at 2:15 p.m.

Messages with Tom Urban (+Redact)

TU

Received on Sep 16, 2019 3:13:50 PM

Do you have a phone number for Cenk Sidar? The one I have is a landline that gets no answer.

Sent on Sep 17, 2019 5:33:31 PM

Red doesn't have his current number. Redact

Reda
ct

TU

Received on Sep 17, 2019 5:35:14 PM

We can also call Jonathan Phillips and see if he can get in touch with Cenk.

Sent on Sep 17, 2019 6:12:46 PM

Cenk Sidar		email 1	Redact	landli...	Red
Redact		email 2	Redact	landli...	act
		address main			
		address parental			
		address business			Redac

Sent on Sep 17, 2019 6:12:46 PM

Do you have these numbers?

TU

Received on Sep 18, 2019 2:15:19 PM

I think that Cenk hired this guy. Got a voicemail but am in cle.

TU

Received on Sep 18, 2019 2:15:20 PM

<https://www.linkedin.com/in/alex-mitrakas> Redac

EXHIBIT B

Handwritten Notes

- Not fair
- Not to contact client
 - Stalky way on order
- DNA sample
- On top of her → don't remember what happened -
don't think I penetrated her
- Close & make-out all night
- Both naked? ⇒ [Pajama?] - Both drunk
 - DNA on pajama
 - She was naked already
 - She slept naked
 - Naked - making out all night
 - Divorced
 - different friend lines
- Next Wednesday
 - September 25th - Wash. D.C. [Bldg. conf. room on 14th fl.]
 - ~~3:00 p.m.~~ • 3 p.m.
 - Frick - Fairfax Co. Circuit Ct.
 - Davenport & attorney fees
 - DNA sample
- Cent Sidar @ gmail.com
 - Send a copy
 - Wally to
- Live in Wash. D.C.
 - Copy in Fairfax → physical address in Va.
 - 1 letter copy. certified in Va. - Per